

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Old LC, Inc. <i>et al.</i> , Debtors.	Chapter 11 Case No. 19-11791 (BLS)
Official Committee of Unsecured Creditors of Old LC, Inc., <i>et al.</i> , for and on behalf of the estates of Old LC, Inc., <i>et al.</i> , <i>Plaintiff</i> , v. Upfront V, LP, Breakwater Credit Opportunities Fund, L.P., <i>et al.</i> , <i>Defendants</i> .	Adv. No. 20-51002 (BLS)

NOTICE OF DEPOSITION OF PLAINTIFF

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable here by Rules 7026 and 7030(b)(6) of the Federal Rules of Bankruptcy Procedure, the Breakwater Defendants¹, by and through their undersigned counsel, will take the deposition upon oral examination of Plaintiff Official Committee of Unsecured Creditors of Old LC, Inc., *et al.*, by a person or persons designated by Plaintiff pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, as applicable through Federal Rule of Bankruptcy Procedure 7030.

The deposition will take place by Zoom video conference and begin at **10:00 a.m., Eastern Time, on September 16, 2021**. The examination will continue from day-to-day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil

¹ The Breakwater Defendants are Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski.

Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped. You are invited to attend and cross-examine.

The person or persons designated to testify on behalf of Plaintiff shall have knowledge of the subjects identified in Schedule A attached hereto.

Dated: August 2, 2021
Wilmington, Delaware

MORGAN, LEWIS & BOCKIUS LLP

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and Joseph Kaczorowski*

SCHEDULE A

SUBJECTS

1. Each economic harm that the Plaintiff alleges was sustained by Loot Crate as a result, in whole or in part, of an act or omission of any Breakwater Defendant.
2. The Plaintiff's quantification of each alleged economic harm to which paragraph 1 refers, and the facts, documents or opinions upon which Plaintiff relies in quantifying the alleged economic harm.
3. All factual bases for Plaintiff's allegations in paragraph 4 of the First Amended Complaint and Objection to Claims.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedures on the 2nd day of August, 2021.

By: /s/ Jody C. Barillare
Jody C. Barillare